

Exhibit A

Declaration of Gabriel Bernarde

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

MEDICAL PROPERTIES TRUST, INC.,

Plaintiff,

v.

VICEROY RESEARCH LLC, *et al.*,

Defendants.

Case No. 2:23-cv-00408-RDP

DECLARATION OF GABRIEL BERNARDE

I, Gabriel Bernarde, do hereby declare as follows:

1. I am a citizen and domiciliary of Australia and am over the age of 18.
2. I am one of the members of Viceroy Research LLC (“Viceroy”).
3. I do not own or lease any property in Alabama.
4. I have no assets in Alabama.
5. To the best of my knowledge, I have never been to Alabama, and have never been

to Alabama in relation to any of the work I do for Viceroy.

6. I did not make any phone calls, send any letters, or send any emails or other electronic communications to anyone in Alabama related to Viceroy’s investigation of Medical Properties Trust, Inc. (“MPT”) or Viceroy’s publications about MPT.

7. I have reviewed MPT’s Complaint against Viceroy and me. None of the alleged defamatory statements that MPT complains about were published by Viceroy or anyone else in Alabama. Rather, all the alleged defamatory statements were published on the internet, addressing a global audience.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 12, 2023.



Gabriel Bernarde